

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

**WATSON GRINDING &
MANUFACTURING CO.**

Debtor.

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Chapter 11

Case No. 20-30967 (MI)

**OFFICIAL COMMITTEE OF JANUARY 24 CLAIMANTS'
APPLICATION TO EMPLOY BURNS BOWEN BAIR LLP
AS SPECIAL COUNSEL TO THE COMMITTEE**

THIS MOTION SEEKS ENTRY OF AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

**To the Honorable Marvin Isgur,
United States Bankruptcy Judge:**

The Official Committee of January 24 Claimants (the “Committee”) files this application (the “Application”) to employ Burns Bowen Bair LLP (“Burns”), as special counsel to the Committee pursuant to 11 U.S.C. §§ 328(a) and 1103(a), together with the Declaration of Timothy W. Burns (the “Burns Declaration”), which is attached as **Exhibit A** of this Application.

PRELIMINARY STATEMENT

1. The Committee respectfully requests that the Court authorize the employment of Burns as special counsel to the Committee under section 1103(a) of Title 11 of the United States Code (the “Bankruptcy Code”). The Committee has engaged Burns to advise and represent its interests in specialized insurance matters that may arise during the pendency of Watson Grinding & Manufacturing Co.’s (the “Debtor”) bankruptcy case.

JURISDICTION AND VENUE

2. This Court has jurisdiction over these cases pursuant to 28 U.S.C. § 1334. This is a core proceeding under 28 U.S.C. §§ 157(b)(2)(A) and (O). The relief requested in the Application is authorized under sections 328(a) and 1103(a) of the Bankruptcy Code.

3. Venue is proper in this district pursuant to 28 U.S.C. § 1408.

BACKGROUND

4. On February 6, 2020 (the “Petition Date”), the Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (the “Bankruptcy Case”).¹

5. The Debtor continues to operate its business as a debtor and debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On February 21, 2020, the United States Trustee for the Southern District of Texas (the “U.S. Trustee”) appointed the Official Committee of January 24 Claimants pursuant to sections 1102(a) and 1102 (b)(1) of the Bankruptcy Code. The Committee consists of the following claimants: (i) Travis Horton, (ii) Massiel Nunez, (iii) Houston Corvette Service, (iv) Margarita Flores, (v) Phillip Burnam, (vi) Janette Thomas, and (vii) Gerardo Castorena, Jr. [Docket No. 89].

6. To date, no trustee or examiner has been appointed in this Bankruptcy Case.

¹ Watson Valve Services, Inc. (the “Watson Valve”) also filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code on February 6, 2020.

RELIEF REQUESTED

7. By this Application, pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, the Committee respectfully requests entry of an order authorizing the Committee to employ and retain Burns as special counsel to the Committee pursuant to the terms of the engagement letter, dated March 26, 2020, and attached as **Exhibit B** of this Application (the “Engagement Letter”).

8. Specifically, the Committee retained Burns to serve as the Committee’s insurance counsel in the Debtor’s bankruptcy case.

BASIS TO RETAIN LUGENBUHL AS SPECIAL COUNSEL

A. Burns’s Qualifications

9. Burns represents a wide array of constituencies in insurance related matters, including general liability insurance, directors’ and officers’ insurance, professional liability insurance, fiduciary liability insurance, cyber insurance, property insurance, and crime and fidelity insurance. Burns also has experience serving as counsel for corporations, as well as counsel to individual plaintiffs in insurance and liability disputes. Importantly, Burns represents insured parties and not insurance companies.

10. Burns has vast experience in complex insurance disputes and contested issues, including coverage litigation, insurance class actions, counterparty disputes with insurers, and domestic and international insurance arbitration. Additionally, Burns also has extensive experience advising and working in concert with other attorneys to navigate discrete insurance issues in the context of complex litigation proceedings.

B. The Engagement

11. The Committee has engaged Burns on the terms and conditions set forth in the Engagement Letter. Accordingly, Burns has or will perform the following services² on the Committee's behalf, including but not limited to:

- (a) Providing guidance and counsel to the Committee in connection with insurance matters in the Debtor's bankruptcy case; and
- (b) Any and all other additional matters as may be directed and agreed in writing between the Committee and Burns.

C. PROPOSED COMPENSATION

12. Under the Engagement Letter, Burns will be retained on an hourly basis and will issue monthly invoices for all fees and reasonable expenses incurred in the prior month, which will be billed hourly in 1/10th hour increments at the following agreed hourly rates:

Professional	Hourly Rate
Timothy W. Burns (TWB)	\$872.00
Jeff James Bowen (JJB)	\$616.00
Freya K. Bowen (FKB)	\$600.00
Jesse J. Bair (JB)	\$500.00
Paralegals and Clerks	\$300.00

13. Other than as set forth above and in the Burns Declaration, no arrangement is proposed between the Committee, on the one hand, and Burns, on the other hand, for compensation to be paid in these Chapter 11 Cases.

14. Burns has further informed the Committee that except for sharing arrangements among Burns and its respective shareholders, it has no agreement with any other entity to share any compensation received, nor will any be made, except as permitted under section 504(b)(1) of the Bankruptcy Code.

² This description is a summary of services provided by Burns. If any inconsistency exists between this description and the terms of the Engagement Letter, the Engagement Letter controls.

D. No Adverse Interest

15. Bankruptcy Code section 1103(b) does not require that Burns be a “disinterested person” under Bankruptcy Code section 101(14), but only that Burns not hold any interests adverse to the Committee or its members with respect to the matters for which Burns is to be employed.

16. To the best of the Committee’s knowledge, and as set forth in the accompanying Burns Declaration, the partners of Burns do not hold or represent any interest adverse to the Committee or its members with respect to the matters for which Burns will be retained.

AUTHORITY FOR RELIEF REQUESTED

17. The Committee seeks to retain Burns pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code. The Committee respectfully submits that the terms of the proposed engagement of Burns including, without limitation, its fees, should be approved.

18. The proposed retention of Burns is appropriate under Bankruptcy Code section 1103(a). Specifically, pursuant to Bankruptcy Code section 1103(a), upon approval of a majority of the Committee’s members and with the Court’s approval, the Committee may “select and authorize the employment . . . of one or more attorneys . . . to represent or perform services for such committee.” 11 U.S.C. § 1103(a).

19. Burns’s retention as special counsel is necessary and in the best interest of the Committee, its members, and the Debtor because accurate interpretation and potential litigation involving the Debtor’s insurance policies will play a critical role in the outcome of this bankruptcy case. Burns is well qualified to serve as special counsel in such capacity, given its experience in the specialized field of insurance litigation. Additionally, since the terms of Burns’s engagement is limited to representing the Committee in pending insurance matters, there is no risk of duplication of services with the Committee’s other retained professionals.

20. Accordingly, based on the facts and for the reasons stated herein and in the Burns Declaration, the retention of Burns as special counsel to the Committee pursuant to this Application is reasonable, necessary and appropriate, and satisfies the requirements of sections 328(a) and 1103(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a).

CONCLUSION

21. The Committee respectfully request that the Court enter the proposed order (a) approving the retention of Burns as special counsel to the Committee pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code; (b) approving the compensation terms set out above; and (c) granting such other and further relief as may be just and proper.

Dated: April 15, 2020

Respectfully submitted,

PORTER HEDGES LLP

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl

Aaron J. Power

1000 Main Street, 36th Floor

Houston, Texas 77002

(713) 226-6000

(713) 226-6248 (fax)

jwolfshohl@porterhedges.com

apower@porterhedges.com

**PROPOSED COUNSEL FOR THE OFFICIAL
COMMITTEE OF JANUARY 24 CLAIMANTS**

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by U.S. First Class Mail and via electronic transmission to all registered ECF users appearing in the case on April 15, 2020.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl

SERVICE LIST

ERIN E JONES
CHRISTOPHER R MURRAY
JONES MURRAY & BEATTY LLP
4119 MONTROSE STE 230
HOUSTON TX 77006

STEPHEN DOUGLAS STATHAM
OFFICE OF US TRUSTEE
515 RUSK STE 3516
HOUSTON TX 77002

ASTRO ALLOYS INC
9155 EMMOTT RD
HOUSTON TX 77040

BAKER BOTTS LLP
910 LOUISIAN ST STE 3200
HOUSTON TX 77002

C&M TECHNOLOGIES GROUP INC
350 NORTH SAINT PAUL ST
DALLAS TX 75201

EARL M JORGENSEN
6201 LUMERDALE RD
HOUSTON TX 77092

GULFCO FORGE COMPANY
6817 INDUSTRIAL RD
HOUSTON TX 77005

HALCO METALS
9611 TELGE RD
HOUSTON TX 77095

HUNTER CHEMICAL LLC
220 COMMERCE DR
STE 200
FORT WASHINGTON PA 19034

LINEAGE ALLOYS
1901 ELLIS SCHOOL RD
BAYTOWN TX 77521

MATHESON TRI-GAS
166 KEYSTONE DR
MONTGOMERYVILLE PA 18936

NORTH AMERICAN HOGANAS CO
111 HOGANAS WA
HOLLSOPPLE PA 15935

NORTON ROSE FULBRIGHT
1301 MCKINNEY ST STE 1500
HOUSTON TX 77010

PARRISH INTERNATIONAL INC
PO BOX 468
HEMPSTEAD TX 77445

SCOTT STAINLESS SPECIALITIES
501 GEORGIA AVENUE
SOUTH HOUSTON TX 77587

TECHNICAL ENGINEERING LLC
100 CHAPEL RD
MANCHESTER CT 6042

THYSSENKRUPP
ATTN: GENERAL COUNSEL
111 W JACKSON BLVD
CHICAGO IL 60604

TRICOR METALS
3517 N LOOP 336 W
CONROE TX 77304

VICTORY METALS
4125 HOLLISTER RD
HOUSTON TX 77080

VINATECH ENGINEERING
7747 FORMULA PLACE
SAN DIEGO CA 92121

WEBB INDUSTRIAL LLC
2433 LOFTON TERRACE
FORT WORTH TX 76109

WATSON VALVE SERVICES INC
4525 GESSNER RD
HOUSTON TX 77041

TEXAS CAPITAL BANK
C/O TIMOTHY MILLION
600 TRAVIS ST
HOUSTON TX 77002

INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY
OPERATION
PO BOX 7346
P

INTERNAL REVENUE SERVICE
300 E 8TH ST
MAIL STOP 5026AUS
AUSTIN TX 78701

RICHARD A KINCHELOE
ASSISTANT UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF TEXAS
1000 LOUISIANA ST STE 2300
HOUSTON TX 77002

ABIGAIL RUSHING RYAN AAG
OFFICE OF THE AG OF TEXAS
BANKRUPTCY & COLLECTIONS DIV
PO BOX 12548-MC 008
AUSTIN TX 78711-2548

JASON B BINFORD
OFFICE OF THE AG OF TEXAS
BANKRUPTCY & COLLECTIONS DIV
P O BOX 12548-MC 008
AUSTIN TEXAS 78711-2548

TIMOTHY A MILLION
HUSCH BLACKWELL LLP
600 TRAVIS ST STE 2350
HOUSTON TEXAS 77002

J SCOTT DOUGLASS
1811 BERING DR STE 420
HOUSTON TEXAS 77057

MUHAMMAD AZIZ
ABRAHAM WATKINS NICHOLS
SORRELS AGOSTO AZIZ & STOGNER
800 COMMERCE ST
HOUSTON TEXAS 77002

JOHN P DILLMAN
LINEBARGER GOGGAN BLAIR &
SAMPSON LLP
PO BOX 3064
HOUSTON TX 77253-3064

AVISHAY MOSHENBERG
MCDOWELL HETHERINGTON LLP
1001 FANNIN STE 2700
HOUSTON TX 7700

RANDALL J POELMA JR
DOYEN SEBESTA & POELMA LLLP
450 GEARS RD STE 350
HOUSTON TX 77067

ELIZABETH C FREEMAN
JACKSON WALKER LLP
1401 MCKINNEY ST STE 1900
HOUSTON TX 77010

RANDY W WILLIAMS
BYMAN & ASSOCIATES PLLC
7924 BRDWAY STE 104
PEARLAND TX 775

L LEE THWEATT
ONE GREENWAY PLAZA STE 100
HOUSTON TX 77046-0102

STEPHEN R WALKER
LAW OFFICES OF MANUEL SOLIS PC
6657 NAVIGATION BLVD
HOUSTON TX 77011

BYRON C ALFRED
2019 WICHITA ST
HOUSTON TX 77004

MATT L MARTIN
ZEHL & ASSOCIATES PC
2700 POST OAK BLVD STE 1000
HOUSTON TX 77056

HENRY FLORES
RAPP & KROCK PC
1980 POST OAK BLVD STE 1200
HOUSTON TEXAS 77056

JARROD B MARTIN
MCDOWELL HETHERINGTON LLP
1001 FANNIN STE 2700
HOUSTON TX 77002

ERIKA L MORABITO
FOLEY & LARDNER LLP
3000 K ST NW STE 600
WASHINGTON DC 20007

WILLIAM T SEBESTA
DOYEN SEBESTA & POELMA LLLP
450 GEARS RD STE 350
HOUSTON TX 77067

RYAN E CHAPPLE
CAIRN & SKARNULIS PLLC
400 W 15TH ST STE 900
AUSTIN TX 78701

ABIGAIL RUSHING RYAN AAG
OFFICE OF THE AG OF TEXAS
BANKRUPTCY & COLLECTIONS DIV
PO BOX 12548-MC 008
AUSTIN TX 78711-2548

JOSEPH D TERRY
ONE GREENWAY PLAZA STE 100
HOUSTON TX 77046-0102

GREGORY J FINNEY
LAW OFFICES OF MANUEL SOLIS PC
6657 NAVIGATION BLVD
HOUSTON TX 77011

RYAN H ZEHL
ZEHL & ASSOCIATES PC
2700 POST OAK BLVD STE 1000
HOUSTON TX 77056

GREGORY F COX
MOSTYLN LAW
3810 WEST ALABAMA ST
HOUSTON TX 77027

KENNETH M KROCK
RAPP & KROCK PC
1980 POST OAK BLVD STE 1200
HOUSTON TEXAS 77056

KATE H EASTERLING
MCDOWELL HETHERINGTON LLP
1001 FANNIN STE 2700
HOUSTON TX 77002

HOLLAND N O'NEIL
FOLEY & LARDNER LLP
2021 MCKINNEY AVENUE STE 1600
DALLAS TX 75201

BRUCE J RUZINSKY
JACKSON WALKER LLP
1401 MCKINNEY ST STE 1900
HOUSTON TX 77010

TAYLOR R ROMERO
CAIRN & SKARNULIS PLLC
400 W 15TH ST STE 900
AUSTIN TX 78701

JASON B BINFORD
OFFICE OF THE AG OF TEXAS
BANKRUPTCY & COLLECTIONS DIV
P O BOX 12548-MC 008
AUSTIN TEXAS 78711-2548

ANNA DEAN KAMINS
KAMINS LAW FIRM PLLC
2925 RICHMOND AVENUE STE 1200
HOUSTON TX 77098

JUAN A SOLIS
LAW OFFICES OF MANUEL SOLIS PC
6657 NAVIGATION BLVD
HOUSTON TX 77011

MATTHEW O GREENBERG
ZEHL & ASSOCIATES PC
2700 POST OAK BLVD STE 1000
HOUSTON TX 77056

MICHAEL DOWNEY
MOSTYLN LAW
3810 WEST ALABAMA ST
HOUSTON TX 77027

CATHRYN J SCHEXNAIDER
MOSTYLN LAW
3810 WEST ALABAMA ST
HOUSTON TX 77027

CHANCE A MCMILLAN
MCMILLAN FIRM PLLC
440 LOUISIANA ST STE 1200
HOUSTON TX 77002-1691

MATHEW MENDOZA
MCMILLAN FIRM PLLC
440 LOUISIANA ST STE 1200
HOUSTON TX 77002-1691

ANTHONY G BUZBEE
JP MORGAN CHASE TOWER
600 TRAVIS ST STE 7300
HOUSTON TX 77002

CHRISTOPHER J LEAVITT
JP MORGAN CHASE TOWER
600 TRAVIS ST STE 7300
HOUSTON TX 77002

RYAN S PIGG
JP MORGAN CHASE TOWER
600 TRAVIS ST STE 7300
HOUSTON TX 77002

MUHAMMAD S AZIZ
800 COMMERCE ST
HOUSTON TX 77002

KARL P LONG
800 COMMERCE ST
HOUSTON TX 77002

BILAAL BADAT
4151 SOUTHWEST FWY STE 320
HOUSTON TX 77027

MARTY HERRING
MARTY HERRING & ASSOCIATES
1616 S VOSS RD STE 890
HOUSTON TX 77057

CAMERON R TEBO
MARTY HERRING & ASSOCIATES
1616 S VOSS RD STE 890
HOUSTON TX 77057

MICHAEL TATE BARKLEY
BAIN & BARKLEY
14090 SOUTHWEST FWY STE 450
SUGAR LAND TX 77478

KARL R SCHNEIDER
BAIN & BARKLEY
14090 SOUTHWEST FWY STE 450
SUGAR LAND TX 77478

BRETT ANTHONY
ANTHONY PETERSON LLP
500 NORTH WATER ST STE 1000
CORPUS CHRISTI TX 78401

ADAM ANTHONY
ANTHONY PETERSON LLP
500 NORTH WATER ST STE 1000
CORPUS CHRISTI TX 78401

DONALD PETERSON
ANTHONY PETERSON LLP
500 NORTH WATER ST STE 1000
CORPUS CHRISTI TX 78401

RUBEN BONILLA JR
BONILLA & CHAPPA PC
2600 GESSNER RD STE 136
HOUSTON TX 77080

VINCE RYAN
HARRIS COUNTY ATTORNEY
ENVIRONMENTAL GROUP
1019 CONGRESS 15TH
FLOOR
HOUSTON TX 77002

SARAH JANE UTLEY
HARRIS COUNTY ATTORNEY
ENVIRONMENTAL GROUP
1019 CONGRESS 15TH FLOOR
HOUSTON TX 77002

KATHY PORTER
AIR COMPLIANCE COORDINATOR
HARRIS COUNTY POLLUTION
CONTROL SVCS DEPT
101 SOUTH RICHEY STE H
PASADENA TX 77506

ROBERT S KWOK
9805 KATY FWY STE 850
HOUSTON TX 77024

J RYAN LOYA
9805 KATY FWY STE 850
HOUSTON TX 77024

JOSHUA R LEAL
9805 KATY FWY STE 850
HOUSTON TX 77024

ALEX P BOYLHART
9805 KATY FWY STE 850
HOUSTON TX 77024

WILLIAM W HOKE (OF COUNSEL)
9805 KATY FWY STE 850
HOUSTON TX 77024

HUSEIN HADI
SEDRICK STAGG
7100 REGENCY SQUARE BLVD STE 140
HOUSTON TX 77036

JAMIL THOMAS
SEDRICK STAGG
7100 REGENCY SQUARE BLVD STE 140
HOUSTON TX 77036

CARNEGIE H MIMS III
SEDRICK STAGG
7100 REGENCY SQUARE BLVD STE 140
HOUSTON TX 77036

ERIC DICK LLM
3701 BROOKWOODS DR
HOUSTON TX 77092

JOEL C SIMON
FERNELIUS SIMON MACE
ROBERTSON PERDUE PLLC
4119 MONTROSE BLVD STE 500
HOUSTON TX 77006

STEPHEN M FERNELIUS
FERNELIUS SIMON MACE
ROBERTSON PERDUE PLLC
4119 MONTROSE BLVD STE 500
HOUSTON TX 77006

POTTS LAW FIRM
3737 BUFFALO SPEEDWAY STE 1900
HOUSTON TX 77098

PEGAH RAHGOZAR
2825 WILCREST DR STE 515
HOUSTON TX 77045

JASON A ITKIN
ARNOLD & ITKIN LLP
6009 MEMORIAL DR
HOUSTON TX 77007

ADAM D LEWIS
ARNOLD & ITKIN LLP
6009 MEMORIAL DR
HOUSTON TX 77007

MICHAEL A DOWNEY
MOSTYN LAW
3810 WEST ALABAMA ST
HOUSTON TX 77027

PAUL B KERLIN
GREENBERG TRAUIG LLP
1000 LOUISIANA ST STE 1700
HOUSTON TX 77002

JAMES R JONES
4185 TECHNOLOGY FOREST BLVD
STE 160
THE WOODLANDS TX 77381

MATHESON TRI-GAS INC
ATTN: GENERAL COUNSEL
150 ALLEN RD - STE 302
BASKING RIDGE NJ 07920

KEVIN M MADDEN
LAW OFFICES OF KEVIN M MADDEN
5225 KATY FWY STE 520
HOUSTON TX 77007

RYAN M PERDUE
FERNELIUS SIMON MACE
ROBERTSON PERDUE PLLC
4119 MONTROSE BLVD STE 500
HOUSTON TX 77006

MICHAEL J BINS
POTTS LAW FIRM
3737 BUFFALO SPEEDWAY STE 1900
HOUSTON TX 77098

LESTER B NICHOLS III
2825 WILCREST DR STE 515
HOUSTON TX 77045

J KYLE FINDLEY
ARNOLD & ITKIN LLP
6009 MEMORIAL DR
HOUSTON TX 77007

CHRISTOPHER L BELL
GREENBERG TRAUIG LLP
1000 LOUISIANA ST STE 1700
HOUSTON TX 77002

CAROLINE L MAIDA
MOSTYN LAW
3810 WEST ALABAMA ST
HOUSTON TX 77027

CHRISTOPHER M LAVIGNE
GREENBERG TRAUIG LLP
2200 ROSS AVE STE 5200
DALLAS TX 75201

JOHN V MCCOY
MCCOY LEAVITT & LASKEY
N19 W242000 RIVERWOOD DR
STE 125
WAUKESHA WI 53188

AUTOMATION PLUS
ATTN: FRANK LOMELO
8930 LAWNGDALE ST STE F
HOUSTON TX 77012

MARK W MORAN
MUNCK WILSON MANDALA LLP
12770 COIT RD STE 600
DALLAS TX 75251

DEREK H POTTS
POTTS LAW FIRM
3737 BUFFALO SPEEDWAY STE 1900
HOUSTON TX 77098

RILEY L BURNETT JR
BURNETT LAW FIRM
3737 BUFFALO SPEEDWAY STE 1850
HOUSTON TX 77098

KURT B ARNOLD
ARNOLD & ITKIN LLP
6009 MEMORIAL DR
HOUSTON TX 77007

KALA F SELLERS
ARNOLD & ITKIN LLP
6009 MEMORIAL DR
HOUSTON TX 77007

GREGORY F COX
MOSTYN LAW
3810 WEST ALABAMA ST
HOUSTON TX 77027

MARY-OLGA LOVETT
GREENBERG TRAUIG LLP
1000 LOUISIANA ST STE 1700
HOUSTON TX 77002

KARL D BURRER
GREENBERG TRAUIG LLP
1000 LOUISIANA ST STE 1700
HOUSTON TX 77002

ANA M ENE
CLARK LOVE & HUTSON PLLC
440 LOUISIANA STE 1700
HOUSTON TX 77002

ADAM D PEAVY
CLARK LOVE & HUTSON PLLC
440 LOUISIANA STE 1700
HOUSTON TX 77002

ARC SPECIALTIES INC
ATTN: L DON KNIGHT
8100 WASHINGTON STE 1000
HOUSTON TX 77007

ARC SPECIALTIES INC
1730 STEBBINS DR
HOUSTON TX 7704

CENTERPOINT ENERGY SERVICE
COMPANY LCC
ATTN: GENERAL COUNSEL
1111 LOUISIANA ST 39TH FLOOR
HOUSTON TX 77002

CENTERPOINT ENERGY SERVICES
INC
ATTN: GENERAL COUNSEL
1111 LOUISIANA ST
39TH FLOOR
HOUSTON TX 77002

CENTERPOINT ENERGY RESOURCES
CORP
ATTN: GENERAL COUNSEL
1111 LOUISIANA ST 39TH FLOOR
HOUSTON TX 77002

CENTERPOINT ENERGY GAS
SERVICES INC – NATURAL GAS
ATTN: GENERAL COUNSEL
1111 LOUISIANA ST 39TH FLOOR
HOUSTON TX 77002

STM & ASSOCIATES
8554 KATY FWY STE 112
HOUSTON TX 77024

3M
3M CORPORATE HEADQUARTERS
2501 HUDSON RD
MAPLEWOOD MN 55144

DETCON
3M CENTER BLDG 224-5N40
SAINT PAUL MN 55144-1001

DETCON
3200 RESEARCH FOREST DR
THE WOODLANDS TX 77381-4219

DETCON
4055 TECHNOLOGY FOREST BLVD
THE WOODLANDS TX 77381

FIRESTONE CRYOGENIC EQUIPMENT
14954 EAST DR
CONROE TX 77302-6600

FIRESTONE CRYOGENIC EQUIPMENT
ATTN: LINDA PLUMMER
12446 CUTTEN RD
HOUSTON TX 77066

RADNOR
AIRGAS INC
259 NORTH RADNOR-CHESTER RD
STE 100
RADNOR PA 19087-5283

OLDHAM A/K/A TELEDYNE GAS & FLAME
AMERICAS – THE WOODLANDS
DETCON INC
4055 TECHNOLOGY FOREST BLVD
THE WOODLANDS TX 77381

WESTERN INTERNATIONAL GAS &
CYLINDER INC
ATTN: DENISE C HAUGEN
7173 HIGHWAY 159 E PO BOX 668
BELLVILLE TX 77418

MILLER SCAMARDI AND CARRABA
ATTN: DAVID MILLER
6525 WASHINGTON AVE
HOUSTON TEXAS 77007

ASTRO ALLOYS
ATTN: KEN WHITED
9155 EMMOTT RD
HOUSTON TX 77040

NATIONAL ALLOY SOLUTIONS
C/O GONZALEZ & ASSOCIATES
ATTN: EDWARD GONZALEZ
2205 FULTON ST
HOUSTON TX 77009

KENNAMETAL INC
ATTN: MICHELLE R KEATING
525 WILLIAM PENN PLACE STE 3300
PITTSBURGH PA 15219

TECHNICAL ENGINEERING LLC
100 CHAPEL RD
MANCHESTER CT 06042

VERTECS
8402 RAYSON RD
HOUSTON TX 77080

ABB
13609 INDUSTRIAL RD GATE 5
COMPLEX 3G WEST
HOUSTON TX 77015

